

# Exhibit 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT) ) MASTER FILE NO.  
ANTITRUST LITIGATION ) CV-07-5944 JST

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THIS DOCUMENT RELATES TO: )

ALL INDIRECT PURCHASER ACTIONS )

ALL DIRECT PURCHASER ACTIONS )

DEFENDANTS. )

\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF LI MIAO  
VOLUME II  
WEDNESDAY, MARCH 8, 2023  
HONG KONG

FILE NO. SF 5759553

REPORTED BY MARK McCLURE, CRR  
CAL CSR 12203

1 VIDEOTAPED DEPOSITION OF LI MIAO, VOLUME II, TAKEN AT  
2 7:58 A.M., WEDNESDAY, MARCH 8, 2023, HONG KONG, VIA  
3 VERITEXT REMOTE TECHNOLOGY, BEFORE MARK McCLURE, C.S.R.  
4 #12203, CERTIFIED SHORTHAND REPORTER IN AND FOR THE  
5 STATE OF CALIFORNIA.

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RAMON PERAZA, VIDEOGRAPHER

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1 would be displayed. It would be shown. 18:59:58

2 Q. The 14-inch CPT that was manufactured at this 19:00:01

3 time, June of 2005, was that round or flat? How would 19:00:06

4 you describe that CPT? 19:00:15

5 MR. CARTER: Object to form. 19:00:19

6 THE WITNESS: The 14-inch has always been FS. 19:00:35

7 BY MR. RUSHING: 19:00:35

8 Q. FS? Is that what you said? 19:00:41

9 A. Yes, it's always been FS for the 14-inch. 19:00:48

10 Q. And what does "FS" mean? 19:00:53

11 A. FS refers to -- I'm not sure if you used to 19:00:56

12 have a CRT TV set at home. On the surface, it still has 19:01:19

13 some curvage. 19:01:26

14 Q. And then "PF" stands for pure flat, is that 19:01:36

15 correct? 19:01:44

16 A. Correct. 19:01:44

17 Q. And am I correct to understand that PF CPTs 19:01:51

18 have no curvature? 19:01:59

19 A. For common users, consumers, the surface that 19:02:01

20 you can see, that's visible to you at home, does not 19:02:23

21 have curvature. 19:02:27

22 Q. And am I correct to understand that the 19:02:42

23 smallest CPT, the 14-inch CPT, would have the lowest 19:02:45

24 cost to manufacture of all of the CPTs manufactured by 19:03:00

25 Irico? 19:03:11

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1	A. Your understanding is correct, if we	19:03:12
2	understand it or look at it from the absolute value	19:03:40
3	perspective.	19:03:45

4	Q. And what perspective would it be potentially	19:03:50
5	incorrect?	19:03:56

6	A. Let me think how I can explain this to you.	19:03:56
7	There's a cost-performance ratio.	19:04:18

8	For example, if I buy a foot of fabric versus	19:05:10
9	buying a meter of fabric, the price for a foot of fabric	19:05:16
10	might be lower than the price of a meter of the fabric.	19:05:21
11	So the average value, the average price for the foot of	19:05:26
12	fabric might be lower.	19:05:33

13	So if we are talking about this from the	19:05:35
14	perspective of a unit, your understanding might not be	19:05:38
15	wrong, but it also may not be correct.	19:05:45

16	Q. Okay, thank you.	19:05:50
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17	But the total cost to manufacture a 14-inch	19:05:58
18	tube, on average, would be lower than the total cost to	19:06:01
19	manufacture a larger tube?	19:06:07

20	A. I said earlier that, in general, you can	19:06:24
21	understand it that way.	19:06:35

22	Q. Okay. And in general, is the cost to	19:06:36
23	manufacture a pure flat screen greater than the cost to	19:06:42
24	manufacture a standard flat screen of the same size?	19:06:54

25           A.     In general, you can say it that way.                                 19:06:59

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DEFENDANTS. )

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VIDEOTAPED DEPOSITION OF LI MIAO  
VOLUME III  
THURSDAY, MARCH 9, 2023  
HONG KONG

FILE NO. SF 5759557

REPORTED BY MARK McCLURE, CRR  
CAL CSR 12203



1 VIDEOTAPED DEPOSITION OF LI MIAO, VOLUME III, TAKEN AT  
2 7:56 A.M., THURSDAY, MARCH 9, 2023, HONG KONG, VIA  
3 VERITEXT REMOTE TECHNOLOGY, BEFORE MARK McCLURE, C.S.R.  
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## PREVIOUSLY MARKED EXHIBITS

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1 are under the oath to tell the truth. 16:22:11

2 A. Yes. 16:22:36

3 Q. So you mentioned that the specification of the 16:22:37

4 deflection yoke is contained in the model number, is 16:22:46

5 that right? 16:22:49

6 A. Yes. 16:22:50

7 Q. What other attributes of the finished product 16:23:02

8 are reflected in the model number? 16:23:07

9 A. I did not understand the meaning of the 16:23:27

10 question. 16:23:29

11 Q. Well, from what you just told me, the model 16:23:30

12 number is -- contains information about the tube, is 16:23:33

13 that right? 16:23:42

14 A. Yes. 16:23:50

15 Q. What type of information can be learned from 16:23:51

16 the model number of a tube that Irico produces? 16:24:05

17 A. Information regarding the dimension, the size, 16:24:25

18 safety information, and also another piece of 16:24:33

19 information, which I'm not sure how to describe. 16:24:53

20 It's the information about whether it 16:24:56

21 satisfies the 50-hertz, 60-hertz, 110-hertz, and also 16:24:59

22 information regarding whether it's a standard flat, 16:25:17

23 ultra flat or pure flat, information regarding if it's a 16:25:20

24 long tube or a short tube. That's the information. 16:25:35

25 I may not remember all of it, but that's the 16:25:41

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1 information. 16:25:44

2 Q. Okay. You mentioned something called a shadow 16:25:44

3 mask earlier. 16:25:47

4 Is information about the shadow mask contained 16:25:50

5 in the model number? 16:25:54

6 A. Only in special circumstances. In most 16:25:55

7 circumstances, it will not be contained in the model 16:26:13

8 number. 16:26:16

9 Q. When would you include information about the 16:26:17

10 shadow mask in the model number? 16:26:20

11 A. In the last two days, a lot of exhibits were 16:26:22

12 shown by the attorney to me, and only the one that has 16:26:52

13 AK in the model number would include the shadow mask 16:26:58

14 information. All the others would not include the 16:27:01

15 shadow mask information in the model numbers. 16:27:04

16 Q. Do you remember, after thinking about it now, 16:27:10

17 what the "AK" stands for? 16:27:12

18 A. I don't understand your question. 16:27:14

19 What did you mean? 16:27:29

20 Q. Does "AK" -- is that an acronym for a word? 16:27:31

21 A. Yesterday, when I was asked about this, I gave 16:27:37

22 a positive answer. Yes, AK is the abbreviation of a 16:27:55

23 phrase. 16:28:01

24 MR. BIRKHAEUSER: Of what? 16:28:02

25 I didn't hear that, Miss Translator. 16:28:04

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1 conversion to the CPT 54-centimeter PF? 20:17:34

2 MR. BIRKHAUSER: Objection. Leading. 20:17:41

3 THE WITNESS: It says the G line was converted 20:18:13

4 into the production line for the 20-inch pure flat, but 20:18:17

5 it doesn't indicate that the time for the conversion was 20:18:23

6 in 2001. 20:18:26

7 It's possible that the conversion took place 20:18:45

8 in 2002 or 2001 -- or 2003. A bigger possibility is 20:18:47

9 that the conversion took place in 2002. 20:18:54

10 BY MR. WERBEL: 20:19:01

11 Q. Thank you, Mr. Li. 20:19:01

12 Moving to some of your earlier testimony also 20:19:02

13 today that I wanted to ask you about. 20:19:07

14 Mr. Birkhaeuser asked you about the different 20:19:13

15 information that was available in the model number 20:19:19

16 itself. 20:19:23

17 Do you remember that line of questioning? 20:19:24

18 A. He asked some questions earlier today 20:19:26

19 regarding model numbers, yes. 20:19:53

20 Q. I believe you stated that one factor that the 20:19:57

21 model number would reveal is whether the product itself 20:20:00

22 is a standard, an ultra flat or a pure flat. 20:20:05

23 Do you remember saying that? 20:20:12

24 MR. BIRKHAUSER: Object to form. 20:20:14

25 THE WITNESS: There was such a question and 20:20:37

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1 answer. 20:20:39

2 BY MR. WERBEL: 20:20:39

3 Q. So when you referred to a product as a 20:20:40

4 standard, what does that mean? 20:20:48

5 A. For a standard product, the model number would 20:20:57

6 not include any special marking. For example, if it's 20:21:16

7 14-inch, it would just say "14-inch." It doesn't say 20:21:21

8 any extra suffix in the model number. 20:21:25

9 21-inch FS refers to the 21-inch ultimate 20:21:40

10 flat. 21-inch pure flat would be the 21-inch PF. 20:21:47

11 That's how the names of these three product 20:22:03

12 types differ. 20:22:07

13 Q. And is a regular flat the same as a standard 20:22:09

14 flat? 20:22:13

15 A. I don't know about the English phrase you just 20:22:28

16 used. 20:22:31

17 MR. WERBEL: Madam translator, was there a 20:22:36

18 difference in Chinese between the standard flat and the 20:22:39

19 regular flat? 20:22:42

20 THE INTERPRETER: Yes. 20:22:43

21 MR. WERBEL: So which does he refer to it as 20:22:48

22 the standard? 20:22:50

23 MR. BIRKHAEUSER: Is there a question pending? 20:22:53

24 MS. YANG: Amanda, can I say something about 20:23:08

25 the translation between these two words, the standard 20:23:10

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